BEFORE THE FEDERAL COMMUNICATIONS COMMISSION WASHINGTON, DC 20554

In the Matter of:)	MB Docket No. 04-233
Broadcast Localism)	WID DOCKET ING. 04-233

TO: Commission's Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

REPLY COMMENT ON NOTICE OF INQUIRY

By counsel and pursuant to the Commission's Rules, 47 C.F.R.§§ 1.415, 1.419, & 1.4130, the Illini Media Company (the "IMC") respectfully submits its comments on the Notice of Inquiry, MB Docket No. 04-233 to the Federal Communications Commission (the "Commission"). The IMC is the licensee of record for WPGU-FM, 107.1 in Champaign-Urbana, Illinois. The IMC provided its initial comments on October 27, 2004. The IMC respectfully provides its reply comments on the Localism Notice of Inquiry from the Commission.

Recent Political Coverage

With the 2004 Presidential Election, WPGU-FM had the unique opportunity to weave local and national election coverage into its news coverage throughout the entire day on November 2, 2004. From 10 a.m. to 12 noon, WPGU-FM aired a program made by a journalism class at the University of Illinois at Urbana-Champaign that discussed a multitude of local and national election issues. WPGU 107.1 put listeners where they want to be on election night. The station interrupted its music programming and went live on the air from 8

to 10 pm. The show consisted of three anchors discussing the election issues, looking at the local races people care about, and giving people the up to the minute national election results as they came in so that listeners always know what was going on. WPGU had reporters at the government centers where the results came in, at various polling places, and just wandering around campus getting student reactions.

Other Localism Coverage Issues

With the recent announcement of subpoenas issued by New York State Attorney General Eliot Spitzer to the major record labels regarding payola, WPGU is concerned. That is why the station supports the local music scene in Champaign-Urbana and surrounding communities. Rather than have its music programming dictated by major record labels, WPGU looks in its own backyard to find true gems of local music to air. Also, WPGU is not affiliated with any radio news networks, although, WPGU does receive the AP Wire service. The effect is that WPGU receives national news, but has the control to tailor its news broadcasts to community. The one national program that WPGU licenses is *Loveline*. *Loveline* is a call-in show airing weekly at 10 p.m. Sunday through Thursday. The show focuses more on sexuality, romance, substance abuse, and suicide prevention, but nonetheless, WPGU feels it is a vital part of its programming for the community. As the IMC is not the licensee for any television frequency, it makes no comment on localism issues for television stations.

Community Service

Going into its eleventh year, WPGU teamed up with the Crisis Nursery, a children's charity in Champaign County, Illinois for Operation Santa Claus. Operation Santa Claus is a program to bring toys to needy children in Champaign County. The entire staff of the station

promotes the fundraising efforts. This year's goal was to raise \$5,000.00 for Operation Santa Claus. On-air personalities participated in a pledge marathon and when the pledge drive was completed, WPGU raised over \$6,200.00 for the Operation Santa Claus and the Crisis Nursery. The staff all pitched in to assemble and wrap presents for the holiday party on December 13, 2004. This is just one of many successful community events in which WPGU participates.

CONCLUSION

The IMC respectfully supports the Commission's NOI regarding broadcast localism, but does not support the creation or imposition of additional rules that may be promulgated by the Commission. The IMC also hopes that it has demonstrated just how much WPGU-FM is a part of the Champaign-Urbana, Illinois community.

Respectfully submitted, ILLINI MEDIA COMPANY

By: /s/
One of Its Attorneys

January 3, 2005

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